

JAP:MKM

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

12 M 601

- - - - - X
UNITED STATES OF AMERICA

- against -

ANDREW RICARDO MORRISON,
also known as
"Mackency Chevelon,"

COMPLAINT AND AFFIDAVIT
IN SUPPORT OF AN
APPLICATION FOR
ARREST WARRANT

(18 U.S.C. § 1542)

Defendant.

- - - - - X
EASTERN DISTRICT OF NEW YORK, SS:

TIMOTHY J. LAWLOR, being duly sworn, deposes and says that he is a Special Agent with the United States Department of State, Diplomatic Security Service ("DSS"), duly appointed according to law and acting as such.

On or about September 22, 2008, within the Eastern District of New York, the defendant, ANDREW RICARDO MORRISON, also known as "Makency Chevelon," did willfully and knowingly make a false statement in an application for a passport with intent to induce and secure the issuance of a passport under the authority of the United States, for his own use, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws.

(Title 18, United States Code, Section 1542).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

1. I am a Special Agent with DSS and have been so for six years. I am familiar with the facts and circumstances set forth below from my personal involvement in the investigation, my review of the investigative file and from reports of other law enforcement officers involved in the investigation.

2. On or about September 22, 2008 the defendant ANDREW RICARDO MORRISON, also known as "Mackency Chevelon," applied for and thereafter received a United States Passport. On the application form DS-11 (hereafter, the "DS-11"), the defendant provided a name of another person as his own and also submitted that person's social security number, date of birth and place of birth as his own. Specifically, the defendant stated among other things, that his name was "Mackency Chevelon" and that his place of birth was Florida.

3. The defendant filled out and submitted the application at the United States Post Office in Jamaica, New York using the above mentioned information.

4. On June 14, 2012, the United States Marshals Fugitive Task Force (USMFTF) informed the New York Field Office

^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

of the DSS that it was pursuing a subject known as "Mackency Chevelon" on a warrant for a parole violation. The New York State Department of Motor Vehicles also received a complaint in February 2011 from someone in Florida claiming to be the true Makency Chevelon (hereafter, the "Complainant"). The Complainant alleged that his identity was stolen by someone in New York who had used his identity.

5. Thereafter, I ran document checks and discovered that two passports had been issued in the name "Mackency Chevelon." One was issued in 1999 to the Complainant. A second passport was issued in Jamaica, Queens to the defendant in 2008.

6. On or about June 20, 2012, the defendant was arrested by the New York City Police Department ("NYPD") on the parole violation warrant. The defendant identified himself as "Andrew Morrison." A records check revealed that a person named "Andrew Ricardo Morrison" applied for a B1/B2 visa in Kingston Jamaica on July 11, 1997, and that the application was denied.

7. After the defendant ANDREW RICARDO MORRISON was placed under arrest, he was advised of his Miranda rights, which he waived. He then was shown the DS-11 bearing his photograph and the name "Makency Chevelon." The defendant acknowledged that it was his picture on the DS-11 and stated, in sum and substance and in part, that his true name is "Andrew Ricardo Morrison" and that he filed the DS-11 in the name "Makency Chevelon." The

defendant further stated that the true Makency Chevelon gave him a copy of his Florida Driver's License, which the defendant later used to obtain a New York State Driver's License in the name of "Mackency Chevelon." The defendant admitted to filling out the DS-11 using the false information, as a result of which a passport was issued.

WHEREFORE, your deponent respectfully requests that the defendant ANDREW RICARDO MORRISON, also known as "Makency Chevelon," be dealt with according to law.

Timothy J. Lawlor

TIMOTHY J. LAWLOR
Special Agent
U.S. Department of State
Diplomatic Security Service

Sworn to before me this
22nd day of June, 2012

HON. CHERYL L. POLLAK
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK